



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 4  
ATLANTA FEDERAL CENTER  
61 FORSYTH STREET  
ATLANTA, GEORGIA 30303-8960

MAR 06 2006

4WD-RCRA

CERTIFIED MAIL  
RETURN RECEIPT REQUESTED

Mr. Glenn Roberts, Health Physicist  
UniTech Services Group, Inc.  
401 North Third Avenue  
Royersford, PA 19468

**SUBJ: CERCLA Off-Site Rule: Voluntary Withdrawal**  
UniTech Services Group, Inc., Columbia, South Carolina

Dear Mr. Roberts:

On May 23, 2000, the UniTech Services Group (UniTech) facility located at 811 South Edisto Avenue in Columbia, South Carolina became acceptable to receive CERCLA Off-Site waste. The CERCLA Off-Site waste to which this letter refers are defined as those wastes generated as a result of activities authorized pursuant to, or funded by, the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA). The receipt of these CERCLA wastes by facilities is regulated by the Off-Site Rule found at 40 C.F.R. § 300.440.

According to a letter from UniTech to the Environmental Protection Agency (EPA) Region 4 dated January 5, 2006, UniTech has ceased operations at its Columbia location, has demolished all buildings, and the site is now a vacant lot. Additionally, the Radioactive Materials License (No. 135) issued to this facility by the State was terminated November 14, 2005. In your January 5, 2006, letter you requested that your Columbia facility be withdrawn from the Off-Site Rule universe. Since 2000 your facility has not had any relevant violations or releases under the Off-Site Rule. Therefore, based on the above, EPA accepts your request to withdraw from eligibility for the receipt of CERCLA offsite waste. If you have any questions concerning this withdrawal, please contact Jack Cowart at (404) 562-8591 or by e-mail at [cowart.jack@epa.gov](mailto:cowart.jack@epa.gov).

Sincerely,

A handwritten signature in black ink, appearing to read "Beverly H. Banister".

Beverly H. Banister  
Acting Director  
Waste Management Division



A SUBSIDIARY OF UNIFIRST CORPORATION

January 5, 2006

2006 DEC 30 A 1:24

Mr. Jack Cowart, 10<sup>th</sup> Floor  
CERCLA Off-Site Coordinator  
Environmental Protection Agency, Region 4  
Atlanta Federal Building, 61 Forsyth Street SW  
Atlanta, GA 30303

RE: Request for Removal from list of sites authorized to receive CERCLA Waste by  
UniTech Services Group, Inc., Columbia, SC

Dear Mr. Cowart:

Please remove UniTech's facility located at 811 South Edisto Avenue in Columbia, SC, from the list of facilities authorized to receive waste pursuant to the CERCLA Off-Site Rule. The location is currently a vacant lot and all building structures have been demolished and removed from the premises. The Radioactive Material License No. 135, issued by the South Carolina Department of Health and Environment Conservation (DHEC), has been terminated; a copy of which is attached.

Extensive radiological testing was performed in support of UniTech's disposition of site materials and request for license termination. Testing and analyses for other hazardous constituents were performed during the process as well. All wastes generated during the decommissioning process were properly disposed of at appropriate radiological and non radiological waste disposal facilities under the supervision of the South Carolina Department of Health and Environmental Control.

Please contact me at your convenience if you have any further questions. I may be reached directly at 610-948-9700, extension 19, or by email at [glenn@u1st.com](mailto:glenn@u1st.com).

Sincerely,

UniTech Services Group, Inc.

A handwritten signature in black ink, appearing to read "Glenn Roberts".

Glenn Roberts  
Health Physicist

cc: Michael R. Fuller, Esq., Manager, Health Physics and Engineering

**SOUTH CAROLINA DEPARTMENT OF HEALTH AND ENVIRONMENTAL CONTROL**  
Radioactive Material License  
Supplementary Sheet

UniTech Services Group, Inc.  
811 S. Edisto Avenue  
Columbia, SC 29205

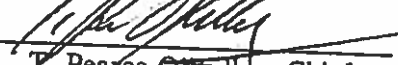
License No. 135  
Amendment No. 32

In accordance with letter dated August 31, 2005, signed by Glenn Roberts, S.C. Radioactive Material License No. 135 is hereby **TERMINATED**.



Date of Issuance: November 14, 2005

For the South Carolina Department  
of Health and Environmental Control

BY:   
T. Pearce O'Kelley, Chief  
Bureau of Radiological Health



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MAY 23 2000

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RETURN RECEIPT REQUESTED

Mr. Michael R. Fuller  
Manager, Health Physics & Engineering  
UniTech Services Group, Inc.  
295 Parker Street  
P.O. Box 51957  
Springfield, MA 01151

SUBJ: CERCLA Off-Site Rule: Notice of Acceptability  
UniTech Services Group, Inc. - Location 251  
811 South Edisto Avenue  
Columbia, South Carolina 29205

Dear Mr. Fuller,

The U.S. Environmental Protection Agency, Region 4 (EPA) has made an **affirmative determination of acceptability** for the receipt of CERCLA Off-Site waste by the UniTech Services Group, Inc. (UniTech) facility located at 811 South Edisto Avenue in Columbia, South Carolina. Such off-site waste is defined as those wastes generated as a result of activities authorized pursuant to, or funded by, the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA).

On September 22, 1993, EPA amended the National Oil and Hazardous Substances Pollution Contingency Plan, 40 C.F.R. Part 300, by adding Section 300.440, now known as the Off-Site Rule. The rule implements and codifies the requirements contained in CERCLA Section 121(d)(3), and incorporates many provisions of the November 13, 1987, Office of Solid Waste and Emergency Response Directive (No. 9834.11), known as the Off-Site Policy. The Off-Site Rule establishes the criteria and procedures for determining if facilities are acceptable for the off-site receipt of CERCLA waste, and outlines the actions affected by the standard.

Pursuant to 40 C.F.R. § 300.440(a)(4), the Off-site Rule requires that prior to a facility's initial receipt of CERCLA offsite waste, EPA shall determine if there are relevant releases and/or relevant violations at the facility being evaluated. EPA believes that affirmative determinations of "compliance" and "control of releases" are necessary before a facility may be deemed acceptable for the receipt of CERCLA offsite waste. In accordance with this regulatory requirement, EPA conducted an initial investigation of the Columbia UniTech facility and

discovered certain information. This information came from telephone calls and written documentation provided by the South Carolina Department of Health and Environmental Control (SC-DHEC), the City of Columbia (City) and the UniTech Services Group headquartered in Springfield, Massachusetts.

EPA spoke with James K. Peterson, Director, Division of Radioactive Materials Licensing and Compliance, Bureau of Radiological Health, SC-DHEC. Mr. Peterson informed EPA that the Columbia UniTech facility is operating under SC-DHEC Radioactive Material License number 135 issued December 17, 1996. He said that this facility is inspected every two years, and was last inspected on June 3, 1998. According to Mr. Peterson, the Columbia UniTech facility did not have any violations or releases pursuant to State radiological rules and regulations, or pursuant to that facility's radiological license. These findings were documented in the State's radiological checklist of that date, and Form 591 which stated that "no items of non-compliance" were found during the most recent State radiological inspection. EPA has reviewed both of these documents.

EPA also spoke with Ms. Dee Bennett and Mr. Jim Collins, both of the Industrial Pre-Treatment Section, Department of Engineering, City of Columbia. They informed EPA that the Columbia UniTech facility does not qualify as a pre-treatment facility and is operating under City of Columbia Sewer Usage Ordinances. They stated that the Columbia UniTech facility does not have any violations or releases relating to wastewater from that facility.

Based on communications with the SC-DHEC and the City of Columbia, EPA has no information indicating any environmentally significant releases of hazardous substances or current violations at the Columbia UniTech facility. Therefore, **effective upon receipt of this letter the Columbia UniTech facility is acceptable to receive CERCLA off-site waste at the Columbia UniTech facility.** This determination does not supersede the requirements of Subtitle C of the Resource Conservation and Recovery Act (RCRA) for CERCLA wastes which are also hazardous, State radiological rules and regulations, or City wastewater requirements.

Please note that the CERCLA off-site status for your facility is dynamic in nature and is subject to change. The CERCLA off-site status for the Columbia UniTech facility will continue until EPA notifies you otherwise. Should any new information affecting this determination develop, EPA reserves its right to revisit this decision. According to 40 C.F.R. § 300.440(b) "*Determination of Unacceptability*," EPA has the authority to revoke this acceptability status.

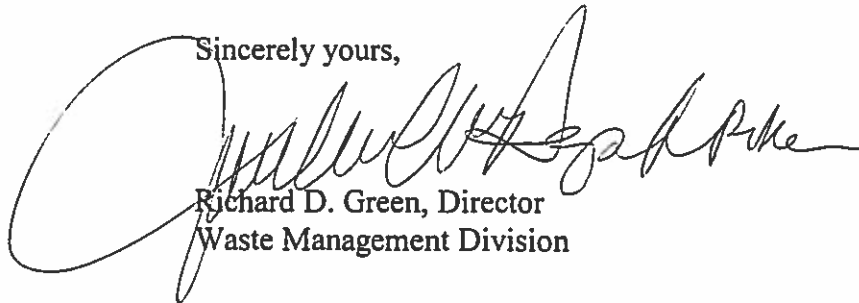
During the course of this evaluation, EPA discovered information that bears attention by the Columbia UniTech facility. On February 24, 1998, the City of Columbia collected wastewater samples at the Columbia UniTech facility. (At that time the facility's name was the "Interstate Nuclear Services Corporation.") The analytical results of that sampling were transmitted to the Columbia facility by letter dated April 7, 1998. A copy of that letter and those analytical results were provided to EPA by you on May 2, 2000. According to the analytical results, the following contaminants were found in your wastewater in small amounts: total cyanide, chloroform, and hexavalent chromium.

Additionally, the City of Columbia sends the Columbia UniTech facility a "Regulated Industrial Wastewater Survey Questionnaire" every two years. The purpose of this questionnaire is to determine if the Columbia UniTech facility should be in the City's Industrial Pretreatment Program. (Pursuant to the City's evaluation of the Columbia UniTech facility, the facility does not qualify to be included in that program.) A copy of the most recent industrial wastewater questionnaire, dated February 25, 1998, was provided to EPA by the City. Attached to this questionnaire was a checklist concerning possible contaminants in UniTech's wastewater discharges. The following contaminants were marked by the facility as being "Suspected Present:" cadmium; copper; lead; zinc; phenol(s); 2,4,6 trichlorophenol; and 2,4 dimethylphenol.

Although the data referenced above does not establish that the Columbia UniTech facility is generating RCRA hazardous wastes, or is otherwise in the RCRA universe, EPA recognizes that the sludge (filter cake) generated at the Columbia UniTech facility may, intermittently, contain significant amounts of RCRA regulated wastes. EPA also knows, based on earlier telephone conversations with you, that this sludge has not been sampled or analyzed. Additionally, since the Columbia UniTech facility receives contaminated clothing and other items from a wide variety of facilities, your facility can not completely control the character of waste generated at the Columbia UniTech facility. Therefore, EPA believes that it is appropriate that the Columbia UniTech facility have the sludge it generates sampled and analyzed on a quarterly basis for one year by an independent laboratory. TCLP analysis for the "Metals and Inorganics" plus "Phenols and Cresols" listed in the questionnaire is requested. EPA requests that this sampling and analysis begin within 60 days of the receipt of this letter, and that the results be forwarded to the EPA contact listed below. EPA feels that this activity is appropriate for confirming the acceptability status provided in this letter.

If you have any questions concerning this notice, please contact Jack Cowart by telephone at (404) 562-8591 or by e-mail at [cowart.jack@epa.gov](mailto:cowart.jack@epa.gov).

Sincerely yours,

A large, stylized handwritten signature in black ink, appearing to read "Richard D. Green".

Richard D. Green, Director  
Waste Management Division

enclosure

cc: Hartsill Truesdale, SCDHEC Central Office  
John Cooper, SCDHEC Central Office  
James Peterson, SC-DHEC Bureau of Radiological Health  
Dee Bennett, City of Columbia, Department of Engineering